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August 22, 2022

**VIA ECF**

Magistrate Judge Jennifer E. Willis, USMJ  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

*Re: Angel Shapiro v. John Doe Corp. I, and Venice Griffin et al*  
1:22-cv-05022-JMF

Dear Magistrate Judge Willis:

This law firm has been retained in the last hour to represent the Defendants in this matter. This letter motion is being filed to request and extension of time to answer or otherwise move.

An Order was previously entered by the Court in this matter on August 8, 2022 requiring that an application for a default judgment be made within two weeks of the Order. I was unaware of the Order until today and as stated above, was just retained. My review of the docket does not indicate that a clerk's default has yet been entered.

There have been no requests for extensions of time to answer or otherwise move.

Given the current Order, the adversary has not consented to an extension. But, advises that he will file an application for a default judgement. Counsel also advises that he will also be moving at the same time to amend the complaint to name the alleged proper entity. Right now, the Complaint names a John Doe entity.

Rather than engage in protracted motion practice, it is respectfully requested that defendants be permitted to answer or otherwise move within two weeks of this letter motion up to and including September 6, 2022.

Given that we have just been retained, the within application could not be made by the undersigned until just now.

We thank the Court for its consideration of the matter.

Respectfully submitted,

GORDON REES SCULLY  
MANSUKHANI, LLP

/s/ Claudia A. Costa  
Claudia A. Costa, Esq.

Cc: Honorable Jesse F. Furman, USDJ  
All counsel of record via ECF